

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Debtor.	Adv. Pro. No. 08-1789 (SMB) SIPA LIQUIDATION (Substantively Consolidated)
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. PF TRUSTEES LIMITED in its capacity as trustee of RD TRUST, SAFEHAND INVESTMENTS, STRONGBACK HOLDINGS CORPORATION, Defendants.	Adv. Pro. No. 12-01701 (SMB)

**STIPULATION EXTENDING TIME TO MOVE,
ANSWER OR OTHERWISE RESPOND TO TRUSTEE'S
COMPLAINT AND ADJOURNING THE PRETRIAL CONFERENCE**

WHEREAS, Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff (the "Trustee") commenced the above-captioned adversary proceeding (the "Adversary Proceeding") by filing a Complaint against RD Trust, SafeHand Investments, and Strongback Holdings Corporation on June 6, 2012; and

WHEREAS, on May 31, 2013, the Trustee filed a First Amended Complaint against defendants PF Trustees Limited in its capacity as trustee of RD Trust ("PF Trustees"), Safehand Investments, and Strongback Holdings Corporation (the "Amended Complaint"); and

WHEREAS, PF Trustees, SafeHand Investments, and Strongback Holdings Corporation (collectively, the “Defendants”) have requested an extension of time to move, answer or otherwise respond to the Amended Complaint.

NOW, THEREFORE, it is stipulated and agreed by and between the Trustee and the Defendants as follows:

1. PF Trustees has been served with the Amended Summons and Amended Complaint in this action and further waives any and all objections and defenses relating to insufficient process or insufficient service of process under Federal Rule of Bankruptcy Procedure 7012, Federal Rule of Civil Procedure 12(b)(4) and (5) and any other applicable rules or provisions.

2. The time for the Defendants to move, answer or otherwise respond to the Amended Complaint is extended from October 15, 2014, up to, and including **November 21, 2014**.

3. The pre-trial conference previously scheduled for December 17, 2014 at 10:00 a.m. shall be adjourned to **January 28, 2015 at 10:00 a.m.**

4. All times set forth in this Stipulation to move, answer or otherwise respond to the Amended Complaint shall be subject to and superseded by any applicable court order providing for a later response date.

5. Except as expressly set forth above, the parties to this Stipulation reserve all other rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect any such rights and defenses.

6. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall

be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7037).

Dated: New York, New York
October 9, 2014

/s/ Thomas L. Long
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Thomas L. Long
Email: tlong@bakerlaw.com
Mark A. Kornfeld
Email: mkornfeld@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and
the estate of Bernard L. Madoff*

Dated: New York, New York
October 9, 2014

/s/ Kiersten Fletcher
Carl H. Loewenson, Jr.
Kiersten Fletcher
Morrison & Foerster LLP
250 West 55th Street
New York, New York 10019-9601
Telephone: (212) 468-8128
Facsimile: (212) 468-7900
Email: cloewenson@mofo.com
Email: kfletcher@mofo.com

*Counsel to Defendants PF Trustees Limited
in its capacity as trustee of RD Trust,
SafeHand Investments, and Strongback
Holdings Corporation*